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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

DARLYN HARRIS MOORE and	)
DARLYN HARRIS MOORE, as Mother	)
and Next Friend of B.J.H., a minor,	)
	) Case No. 4:19 CV 1956 RWS
	)
Plaintiffs,	)
VS.	)
	)
UNITED STATES OF AMERICA,	)
ET AL.	)
	)
Defendants.	)

## MOTION FOR APPOINTMENT OF NEXT FRIEND

Plaintiff Darlyn Harris Moore, appears by and through counsel, and for her Motion for Appointment of Next Friend, states:

- 1. B.J.H. is a minor children residing in St. Louis County, State of Missouri.
- 2. B.J.H.'s date of birth is July 14, 2017, and he is currently 3 years of age.
- 3. Pursuant to Rev. Mo. Stat. §507.110, a "next friend" must be appointed for B.J.H., to prosecute the above-captioned suit given the minor status of B.J.H.
- 4. Darlyn Harris Moore is the biological mother of B.J.H. and resides with the minor child in St. Louis County, State of Missouri.
  - 5. Darlyn Harris Moore is also a named Plaintiff in this case.
  - 6. The biological father of minor child B.J.H., Forrest Green is deceased.
- 7. Darlyn Harris Moore consents to consents to appointment as "next friend" for Minor Child B.J.H.

WHEREFORE, Darlyn Harris Moore, agrees to accept the responsibilities of a Next Friend and carry out the orders of the Court, and prays for an order of this Court appointing Darlyn Harris Moore, as Next friend of minor B.J.H.

) ss. COUNTY OF ST. LOUIS )	
	E, of lawful age, being duly sworn upon her oath, states that above and the facts stated therein are true according to her DARLYN HARRIS MOORE
Subscribed and sworn to before me, a Notary Public, this <u>25</u> day of <u>JUUL</u> , <u>2021</u> .	
My Commission Expires:	Notary Public Putrus

GABRIELLA PATANA
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Feb. 27, 2022
Commission # 14921146

STATE OF MISSOURI

Dated:

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/s/Daniel P. Finney, Jr., #26389 225 S. Meramec Suite 1200 St. Louis, MO 63105 (314) 646-0300 (314) 646-0303 FAX Attorney for Plaintiff dan@finneylawoffice.com

## **CERTIFICATE OF SERVICE**

I, Daniel P. Finney, Jr., of Finney Law Office, LLC, counsel for Plaintiffs, hereby certify a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notification to the following CM/ECF participants this 28<sup>th</sup> day of June, 2021.

/s/ Nicholas Llewellyn
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